

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

MARTHA HART, Individually and on  
Behalf of Minors OJE EDWARD HART  
and ATHENA CHRISTINE HART,

and

STU and HELEN HART,

Plaintiffs,

v.

WORLD WRESTLING FEDERATION  
ENTERTAINMENT, INC., et al.,

Defendants and  
Third-Party Plaintiffs,

v.

AMSPEC, INC., LEWMAR LIMITED, and  
LEWMAR, INC., formerly known as  
LEWMAR MARINE, INC.,

Third-Party Defendants.

Case No. 99CV-210774  
Honorable Douglas E. Long, Jr.

**LEWMAR'S OBJECTIONS TO AND MOTION TO STRIKE CERTAIN OF WWE'S  
DESIGNATIONS FROM THE DEPOSITION OF ELLIS EDWARDS**

COME NOW third party defendants Lewmar, and object to and move to strike certain portions of WWE's designations from the deposition of Ellis Edwards. Lewmar states as follows in support of this motion:<sup>1</sup>

**Page 42, line 20 through p.43, line 12:** This testimony is offered to show Mr. Edwards first used a Lewmar trigger latch shackle in 1993. However, it is clear from his testimony immediately

<sup>1</sup> A copy of all cited portions of Mr. Edwards' deposition is attached hereto as Exhibit A.

following that designated by the WWE that he is not sure whether or not that was a Lewmar shackle as opposed to some other manufacturer. (See, Exhibit A, Edwards' depo, page 43, lines 18-21)

**p.46, line 11 through p.47, line 5**

**p.49, lines 7-16;**

**p.55, line 17 through p. 56, line 7;**

**p.59, line 15 through p.60, line 14; and**

**p.120, line 17 through p.121, line 17:** This testimony is offered to show the Lewmar trigger

latch shackle was used for the flying on Bay Watch Nights. However, Mr. Edwards admits on page 58 of his deposition that he does not know whether a Lewmar shackle was used or some other shackle. (See, Exhibit A, Edwards' depo., page 58, lines 10-16)

**p.71, lines 16-23:** This testimony includes Mr. Edwards' opinion that he is afraid of a 3-ring release. There is no foundation for that testimony from Mr. Edwards.

**p.180, lines 2-4:** This testimony is offered to prove Talbert was a qualified or good stuntman and knew how to rig. However, the offered testimony is a hearsay statement made by Mr. Brazel.

**p.199, line 9 through p.200, line 4**

**p.219, line 13 through p.220, line 8:** This testimony goes to show what Barry Brazel would do or not do with respect to use of a shackle. It is objectionable in that it is speculation, hearsay, and lacks foundation.

**p.219, lines 6-12:** This testimony is offered to establish Lewmar or similar shackles are still being used in the stunt industry. However, Mr. Edwards testified he has not personally seen them in use, and therefore his testimony is based on speculation, is not based on first-hand knowledge, and lacks foundation. Further, the Court's order excluding evidence of post-Hart descents should also mean post-accident use of shackles in the stunt industry are excluded as well.

**p.243, line 17 through p. 244, line 20**

**p.245, lines 2-9; and**

**p.245, line 20 through p.247, line 8:** This testimony addresses what others have said to Mr.

Edwards, and is hearsay.

**p.248, lines 9-24:** In this portion of Mr. Edwards' testimony, he discussed what is on a video tape that he did not see, and apparently has never seen. There is no foundation for this testimony and it is based on speculation.

WHEREFORE, Lewmar requests the Court strike those portions of WWE's designations from the deposition of Ellis Edwards identified above, and for such other and further relief as the Court deems appropriate.

Respectfully submitted,

FOLAND, WICKENS, EISFELDER,  
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LEWMAR, LTD. AND LEWMAR, INC.**

**CERTIFICATE OF SERVICE**

I certify that a copy of the above and foregoing was served this 2 day of September 2003, by  
facing the same to:

*hand-delivering*

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ENTERTAINMENT, INC. F/K/A TITAN SPORTS, INC.,  
VINCENT MCMAHON AND LINDA MCMAHON*

Honorable Carl D. Gum, Jr.  
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Raymore, MO 64083

Honorable Douglas E. Long, Jr.  
Presiding Judge  
25<sup>th</sup> Judicial Circuit  
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\_\_\_\_\_  
*ATTORNEY FOR THIRD-PARTY DEFENDANTS  
LEWMAR, LTD. AND LEWMAR, INC.*

**Exhibit A**



1 IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

2 MARTHA HART, Individually and on )  
 3 Behalf of Minors OJE EDWARD HART.)  
 4 and ATEHA CHRISTINE HART, and )  
 5 STU HART and HELEN HART, )

6 Plaintiffs, )

7 vs. )

No. 99CV-210774

8 WORLD WRESTLING FEDERATION )  
 9 ENTERTAINMENT, INC., et al., )

10 Defendants and )  
 11 Third-Party Plaintiffs, )

12 vs. )

13 AMSPEC, INC., LEWMAR LIMITED )  
 14 and LEWMAR, INC., formerly known )  
 15 as LEWMAR MARINE, INC., )

16 Third-Party Defendants. )

17 THE VIDEOTAPED DEPOSITION OF ELLIS EDWARDS,  
 18 on behalf of the Defendants Lewmar, between the hours  
 19 of eight o'clock in the forenoon and six o'clock in  
 20 the afternoon of Friday, May 10, 2002, at 35 14th  
 21 Street, in the City of Atlanta, in the County of  
 22 Fulton, and State of Georgia, before me,

23 SAUNDRA A. TIPPINS, CCR  
 24 of

25 JOHN M. BOWEN & ASSOCIATES,  
 Shorthand Reporters,

a Notary Public, in a certain cause now pending in  
 the Circuit Court of Jackson County, Missouri,  
 wherein MARTHA HART, et al., are the Plaintiffs  
 and WORLD WRESTLING FEDERATION, ET AL., are the  
 Defendants and Third-Party Plaintiffs, and AMPEC,  
 INC., et al., are Third-Party Defendants.

JOHN M. BOWEN & ASSOCIATES, COURT REPORTERS

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<p>1 A Right.</p> <p>2 MR. O'DEAR: I object again to the</p> <p>3 leading. I object to the form. He is not an</p> <p>4 adverse witness.</p> <p>5 JUDGE GUM: The question is leading.</p> <p>6 The objection will be sustained.</p> <p>7 Q (By Mr. Harris) And when you first purchased</p> <p>8 it, the Lewmar trigger latch shackle, what was</p> <p>9 your understanding as to its originally</p> <p>10 designed intended use on a sailboat?</p> <p>11 A Well, it was to release any type of sailing</p> <p>12 mechanism that was under pressure quickly.</p> <p>13 Q Under a load?</p> <p>14 A Yeah, under a load.</p> <p>15 Q So did you understand that the Lewmar trigger</p> <p>16 latch shackle when you bought it was a piece of</p> <p>17 hardware that could be released or unlatched</p> <p>18 under load?</p> <p>19 A Yes, yes.</p> <p>20 Q When was the first time that you bought a</p> <p>21 Lewmar trigger latch shackle?</p> <p>22 A Used one or bought one?</p> <p>23 Q Let's talk about first use. Did that occur</p> <p>24 first?</p> <p>25 A Oh, yeah. We were using these on Bay Watch.</p>	<p>1 We were using them on Thunder in Paradise.</p> <p>2 These go back -- the first time I started</p> <p>3 seeing them was out in Hollywood probably in</p> <p>4 1993.</p> <p>5 Q So you first saw them out in Hollywood 1991 on</p> <p>6 what project or show?</p> <p>7 A We had some -- I believe the first time I saw</p> <p>8 it was on Thunder in Paradise.</p> <p>9 Q And how was the Lewmar trigger latch shackle</p> <p>10 being utilized as you saw it?</p> <p>11 A We had a guy hanging out of a tree, out of a</p> <p>12 palm tree.</p> <p>13 Q How high was he suspended?</p> <p>14 A 25 feet in the air.</p> <p>15 Q Was he being held up by one Lewmar trigger</p> <p>16 latch shackle?</p> <p>17 A I don't remember.</p> <p>18 Q But you are certain it was a Lewmar trigger</p> <p>19 latch shackle as opposed to some other</p> <p>20 manufacturer's shackle?</p> <p>21 A No. That is the first time I ever saw a</p> <p>22 shackle being used that had quick releases like</p> <p>23 that. (Witness indicating).</p> <p>24 Q Do you know who had acquired the Lewmar trigger</p> <p>25 latch shackle?</p>
Page 44	Page 45
<p>1 A No.</p> <p>2 Q Do you know where it came from?</p> <p>3 A No.</p> <p>4 Q And specifically what retail outlet it was</p> <p>5 purchased from?</p> <p>6 A No.</p> <p>7 Q When is the first time you ever bought a Lewmar</p> <p>8 trigger latch shackle of that type?</p> <p>9 A 1990 -- probably 1996, '97.</p> <p>10 Q Why did you buy a Lewmar trigger latch shackle?</p> <p>11 A Barry had recommended them.</p> <p>12 Q Barry Brazel?</p> <p>13 A Yeah.</p> <p>14 Q What type of activity were you working on where</p> <p>15 you thought you might need one?</p> <p>16 A It could have been '97. We were using a</p> <p>17 descender, and they were using them on a</p> <p>18 descender.</p> <p>19 Q What is a descender?</p> <p>20 A It's the type of device used to drop people off</p> <p>21 of a building and let them get within six feet</p> <p>22 of the ground before it stops you. It's a</p> <p>23 spool, and obviously when the cable goes around</p> <p>24 the big part of the spool it drops you rapidly.</p> <p>25 Then as it gets smaller it slows you down so</p>	<p>1 you can jumping off of a building, and it drops</p> <p>2 you 250 feet and before you get 10 feet off the</p> <p>3 ground it stops you.</p> <p>4 Q What were you contemplating the use of a Lewmar</p> <p>5 trigger latch shackle for in that type of</p> <p>6 descent stunt?</p> <p>7 A Actually when we practiced it we put weights on</p> <p>8 the system, and this was just to be able to let</p> <p>9 it go.</p> <p>10 Q All right. So you --</p> <p>11 A Didn't even have to have them. We just -- they</p> <p>12 were just out there.</p> <p>13 Q So Mr. Brazel told you about a shackle he had</p> <p>14 seen, and did he provide you with the shackle</p> <p>15 or did you buy it?</p> <p>16 A I think the first ones he had. I'm not sure.</p> <p>17 Then I just went and -- I was living in L.A. at</p> <p>18 the time so --</p> <p>19 Q Where did you buy your first Lewmar trigger</p> <p>20 latch shackle?</p> <p>21 A The first one from AMSPEC.</p> <p>22 Q Had you purchased hardware from AMSPEC prior to</p> <p>23 that?</p> <p>24 A Oh, yes.</p> <p>25 Q But not a Lewmar trigger latch shackle?</p>



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1 A No.  
2 Q And that would have been in 1996 or '77?  
3 A Yeah. Probably '97, '98. Probably '97, '98.  
4 Q In your experience with AMSPEC did you have  
5 some type of catalog that you could look at in  
6 terms of the things that they offered?  
7 A No.  
8 Q Did you actually go to AMSPEC to buy this  
9 shackle?  
10 A Yes.  
11 Q Why did you pick out the Lewmar trigger latch  
12 shackle from AMSPEC?  
13 A From using them on other movies. You know, I  
14 had seen them used often. All that flying on  
15 Bay Watch Nights was all done with one of  
16 these.  
17 MR. O'DEAR: On Bay Watch Nights?  
18 THE WITNESS: Yes.  
19 MR. O'DEAR: Is that different from  
20 Bay Watch?  
21 THE WITNESS: Yeah. That was a  
22 spinoff. We did it two years and then they  
23 dropped it. He was a detective on that one.  
24 But a guy named Steve Hart was stunt  
25 coordinator, and I was helping him rig on the

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1 can belay by myself. I can put it in a garbage  
2 can and jump out of a building and it will only  
3 go so fast because it goes through a figure  
4 eight.  
5 And then the people loved it and it saved  
6 them 10,000 a show because that's what it cost  
7 to haul that thing up in the ceiling and be  
8 practiced for two days before you get there.  
9 Q So with a descender it costs \$10,000 more than  
10 the belay method Mr. Brazel came up with?  
11 A Yeah, between five and ten by how much you are  
12 aware, but you have to bring it in a truck and  
13 it takes a day and-a-half to set it up until  
14 it's flawless.  
15 Q And you have to practice for two days with the  
16 descender to get it right?  
17 A Yeah. I'm very funky about safety. I don't  
18 trust the descender so I just make sure the  
19 thing is flawless, and then I do it before he  
20 does it so I guarantee it's frigging flawless.  
21 Q Before I ask you some questions about the Sting  
22 stunt that is the first time you utilized a  
23 trigger latch shackle in a professional rigging  
24 job, I want to go back and finish up talking  
25 about your experience on flying stunts.

1 flying on it.  
2 Q (By Mr. Harris) On the Bay Watch Nights  
3 program?  
4 A When we were doing that type of stunt on the  
5 show.  
6 Q So in 1997/1998 you went into AMSPEC. You  
7 purchased a Lewmar trigger latch shackle?  
8 A Yeah, a bunch of them.  
9 Q Why were you purchasing it?  
10 A Because I was going to start descending Sting  
11 from the ceiling with one.  
12 Q And was that your first professional use of a  
13 Lewmar trigger latch shackle in which you were  
14 going to develop the rigging for a descent  
15 stunt?  
16 A Yes. Barry came up with a great idea. Instead  
17 of hauling this big descender in the ceiling,  
18 let's just one night fool them and drop him on  
19 a rope and see if anybody says anything. You  
20 know, like you would be repelling someone, let  
21 the bottom, the person on the bottom called a  
22 belayer, so all you are doing is it in reverse.  
23 You are belaying him from the top.  
24 And then it has a tie-off, so that even if  
25 you let go of it, it can only go so fast. I

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1 As I recall, your experience with flying  
2 stunts would have started approximately 1991.  
3 Is that right?  
4 A Uh-huh.  
5 Q Is that a yes?  
6 A Yes.  
7 Q And then the first time you actually saw a  
8 Lewmar trigger latch shackle would have been in  
9 1993 on the Thunder in Paradise show?  
10 A Correct.  
11 Q And you also saw the Lewmar trigger latch  
12 shackle of that type, Exhibit 117, utilized on  
13 the Bay Watch Nights program?  
14 A Correct.  
15 Q What years was that?  
16 A 1995.  
17 Q Did you mention two years that it was the Bay  
18 Watch Nights program went?  
19 A Yeah, but only -- we didn't fly somebody every  
20 episode so I saw it in 1995.  
21 Q Starting in 1991, when was the first time you  
22 would have rigged a flying stunt in which you  
23 lowered somebody from a height down to the  
24 ground?  
25 A 1997.



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1 Q Why do you do that?  
2 A Well, one is — one stays in place all the  
3 time. You can't get through the threads of the  
4 material. They loop it and triple stitch it.  
5 So you have one to where you can just hook into  
6 it and one so right when you get off you can  
7 unhook it.  
8 Q Does metal on metal allow for a cleaner  
9 release?  
10 A It doesn't make any difference.  
11 Q All right.  
12 A No difference at all. Well, there is a  
13 difference. When you use metal rigging  
14 obviously, it can handle more strength.  
15 Aluminum is lighter. Mountain climbers have to  
16 carry so much equipment to climb to the top of  
17 a mountain they like everything aluminum.  
18 If you took an aluminum piece you could  
19 also get a metal one and this same little bitty  
20 device that weighs two ounces does the same  
21 thing as what weighs two pounds. It could do  
22 the same thing. It depends on how it is forged  
23 and put together.  
24 Q Would those two devices, one aluminum, one  
25 steel, have the same rating for a break working

1 load or breaking load?  
2 A It could. It could. The difference is the  
3 steel one is made for overall use of  
4 repetition. When you are out on a job site and  
5 someone is clicking into it and not paying  
6 attention he doesn't care. It can set. It can  
7 rust. It can stay in the rain. It can stay  
8 underwater in a lake, take it out, and nothing  
9 is wrong with it. You might not be able to  
10 unscrew it but its ability to have strength has  
11 not changed.  
12 Aluminum, you don't freeze them. Don't  
13 let them get too hot. Obviously being aluminum  
14 if you drop them — I don't ever use anything  
15 if my guy drops it on the ground. I throw it  
16 in the garbage.  
17 Q After this tree stunt, the next time you would  
18 have been involved in the rigging of a human  
19 descent would have been on the movie involving  
20 Steve Hart. Is that right?  
21 A Episodic TV, Bay Watch.  
22 Q That was a Bay Watch?  
23 A Bay Watch Nights, correct.  
24 Q And you have already told us about that? It is  
25 a repelling descent?

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1 A No. On Bay Watch Nights it was a guy flew out  
2 of one section of the building and had to pick  
3 a girl up that was hanging over — she was  
4 hanging, and what he did is he came and grabbed  
5 her and swung her back and when they pulled the  
6 release they could keep it all in one motion  
7 and never had to stop film.  
8 Q And what year was that?  
9 A 1995.  
10 Q Was that before the movie with Steve Hunt?  
11 A Steve Hart. That was the TV show with Steve  
12 Hart, yes. We did a movie after that where we  
13 did the repelling in the snowing scene. Yes,  
14 correct. That is before it.  
15 Q Let's go back to the Bay Watch Nights program  
16 where it involved two performers, two  
17 performers being lifted or moved by rigging.  
18 A Yes, correct.  
19 Q The first person has to drop down and then pick  
20 somebody up?  
21 A Just jump out of the rafters, and then you  
22 pivot, so you pull him to the longest point of  
23 your line, and then just a pendulum swings  
24 down, swings up. Then there is a girl hanging  
25 here.

1 You have to judge the difference where he  
2 can grab her. He grabs her and from the  
3 momentum of going up, just like a clock it  
4 swings you up, back, up onto another beam. To  
5 get her off that line to you pull the release,  
6 which would let her come back to you. She is  
7 just hanging there on a release. You can't see  
8 it.  
9 Q All right.  
10 A And then there is a line out there. So he  
11 grabs the line. She never does anything but  
12 sits there.  
13 Q All right.  
14 A Because if he doesn't grab the line you do the  
15 stunt again. She just sets up there.  
16 Q Let's take it one step at a time. The male  
17 performer that does the swinging over to grab  
18 the girl, how is he connected to a line?  
19 A Just with a carabiner. He doesn't need a  
20 release.  
21 Q A screw locking carabiner?  
22 A I don't remember what kind was used on there.  
23 Q Some type of locking carabiner?  
24 A Yeah. I guarantee it was a locking of some  
25 type.



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1 Q Was he on one lock?  
2 A Yes.  
3 Q And he is wearing some type of safety harness  
4 to which the line is connected to the harness?  
5 A Correct.  
6 Q And then he swings over to the point where the  
7 girl is situated, and she is held up on how  
8 many lines?  
9 A Just one.  
10 Q And what is the fastening device that was  
11 utilized on this Bay Watch Nights program?  
12 A Just a shackle.  
13 Q Was it a Lewmar trigger latch shackle?  
14 A I couldn't tell you.  
15 Q It could have been somebody else's shackle?  
16 A Yeah.  
17 Q Up until that point in 1995, what types of  
18 manufacturers make a quick release type shackle  
19 that you had seen?  
20 A I couldn't tell you.  
21 Q There were others besides Lewmar?  
22 A Oh, tons of them.  
23 Q And you had seen others used in the industry up  
24 to that point?  
25 A Correct. They sell them at Home Depot.

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1 pulled one direction. You can reverse it and  
2 pull it down to release it or the load is on  
3 the bottom and you pull up. It won't release  
4 any other direction.  
5 Q If you pull the ring in any other direction,  
6 it's not going to release?  
7 A No.  
8 Q In your experience?  
9 A It won't. Just the laws of what it is, it will  
10 not, you know -- up and down and when it goes  
11 in there, there is a groove and it latches down  
12 on this. So if you pull it sideways you are  
13 pulling metal against metal. It will never  
14 release.  
15 Q You have utilized in this demonstration of how  
16 to use a lanyard or piece of string of some  
17 type, utilized the Lewmar trigger latch  
18 shackle. Up until 1995 you had seen various  
19 other different types of shackles of similar  
20 design?  
21 A Right. I have had both since I was young. I  
22 had some property on the lake. So in marinas  
23 you see it all the time.  
24 Q You have seen other marine shackles that had a  
25 ring on them to which you could attach a

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1 Q All right. And do they sell Lewmar trigger  
2 latch shackles at Home Depots?  
3 A They sell a shackle at some locations of Home  
4 Depots.  
5 Q Do they sell a Lewmar trigger latch shackle at  
6 Home Depot?  
7 A I would not know.  
8 Q And these other types of shackles that you were  
9 familiar with up to 1995, did they have a quick  
10 release type of function to them?  
11 A Yes, a ball pin release.  
12 Q And is that similar to the release you have on  
13 the trigger latch shackle?  
14 A Yes.  
15 Q And in this situation this Bay Watch Nights  
16 program, how was the girl performer released  
17 from the shackle that was holding her up?  
18 A By you put a lanyard on here.  
19 Q What is a lanyard?  
20 A A lanyard is a device so that you can  
21 physically grab and release this. On any type  
22 of device there is a safety backup, which is  
23 this manually -- or a lanyard, which when you  
24 pull it -- it's hard to pull it. If you pull  
25 it straight up it releases. It can only be

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1 lanyard?  
2 A Yes.  
3 Q And up to 1995 you had seen various types of  
4 those marine shackles utilized for quick  
5 release?  
6 A Correct.  
7 Q How many different times would you say you had  
8 been familiar with up to this Bay Watch Nights  
9 program?  
10 A I have seen them for commercial use, these  
11 gigantic steel ones, and they pull a device on  
12 it, and they lift air conditioners on  
13 buildings. Under helicopters whenever you are  
14 lifting with hueys, those are the dual prop  
15 ones like you saw in the military, when you  
16 pick up a device like an air conditioner by law  
17 FAA requires a quick release just like that but  
18 a very elaborate one. It's electric. And --  
19 Q Let's focus in on the flying performance type  
20 shackles involving some type of quick release  
21 function. Up until 1995 about how many of  
22 those had you seen?  
23 A Numerous.  
24 Q More than ten different types?  
25 A Well, I mean, I wouldn't know how many



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1 release being utilized in any type of human  
2 flying stunt?  
3 A Not knowing it.  
4 Q I'm sorry?  
5 A Not knowing it. Ringling Brothers does it all  
6 the time. That is how they do their stuff, not  
7 knowing that's what they were using, but I had  
8 seen it because Barry worked for the circus, so  
9 when he tells me all this stuff I'm like I have  
10 been seeing that since I was a kid. I never  
11 realized that's how they did it.  
12 Q Barry Brazel?  
13 A Barry Brazel.  
14 Q The person that you worked with on the Sting  
15 stunt?  
16 A Yes. He was my head rigger.  
17 Q And you and Mr. Brazel would have been the  
18 folks that trained Bobby Talbert on doing the  
19 Sting stunt?  
20 A No. Barry Brazel.  
21 Q Barry Brazel.  
22 A Well, and I don't know that formally. I  
23 just -- he had worked with Barry but he had  
24 been a stunt man and he had worked with -- he  
25 had worked with Barry and he had been there

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1 A You said flying.  
2 Q Yes.  
3 A That is the key word.  
4 Q You had used or you have never used a three  
5 ring release in a flying stunt with a human?  
6 A No.  
7 Q How have you utilized a three ring release with  
8 humans?  
9 A I made the ring fall apart with everyone in it  
10 at WCW.  
11 MR. O'DEAR: Could you speak up?  
12 THE WITNESS: I made the ring fall  
13 apart.  
14 Q (By Mr. Harris) The wrestling ring?  
15 A Yeah. I mean, a man physically made the whole  
16 ring fall and everybody fell. It was all done  
17 by me with a three ring -- custom-made three  
18 ring releases.  
19 Q How many three ring releases were involved in  
20 that type of set up?  
21 A Four. What holds the ring up is the ropes on  
22 the top. There is cables underneath. Then  
23 when you pull the bottom, it makes the top  
24 taut. There is just thousands of pounds on it.  
25 I had AMSPEC make three ring releases, and

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1 when we have done it. He's gone out there. I  
2 just -- a lot of times when I am doing a stunt  
3 for them I got three stunts going on. He might  
4 have been rigging the pull out, not even the  
5 drop down.  
6 The drop down required two people, only  
7 two people, same people every time. If one  
8 wasn't there we would call the stunt off.  
9 Q I will come back to that in just a minute. Do  
10 you know as of 1995, did you know of any  
11 non-circus type flying stunts that were done  
12 with a three ring release?  
13 A No.  
14 Q You hadn't had any experience with it?  
15 A No.  
16 Q Have you ever used a three ring release in a  
17 human descent type stunt?  
18 A No.  
19 Q Why not?  
20 A I have used them in other manners with humans  
21 but not in a descent.  
22 Q Why not in a descent?  
23 A I'm afraid of them.  
24 Q And what type of flying stunts have you  
25 utilized a three ring release with a human?

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1 right before it happens I crawl under and I  
2 pulled all four of them.  
3 Now it's still up. It's a little weak.  
4 Then when the Giant grabbed it, he is so strong  
5 you he pulled one post out. When you pull a  
6 post out, you pull it all down. It made him  
7 look like he was above human strength. That  
8 was how it was done.  
9 Q When was that stunt done?  
10 A I couldn't tell you.  
11 Q I mean just a year.  
12 A '98, '99.  
13 Q Would that stunt have been done before Owen  
14 Hart's stunt in May of 1999?  
15 A Yes.  
16 Q Have you ever heard of a pelican release?  
17 A No.  
18 Q Have you ever heard of a squib release?  
19 A Squib release?  
20 Q Yes.  
21 A Yeah.  
22 Q What is a squib release?  
23 A A squib is a tiny charge on a body and that's  
24 how that one -- that other release. In other  
25 words a charge makes it release.



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1 Q What did they tell you?  
2 A I don't remember.  
3 Q Did they tell you that they got them from some  
4 marine outlet?  
5 A No. They don't really disclose that stuff or  
6 we'll all go and buy from the source.  
7 Q Had you ever heard any Lewmar trigger latch  
8 shackles from a company called Action  
9 Specialists?  
10 A No. I know who they are.  
11 Q Other than the one time with AMSPEC, have you  
12 bought a Lewmar trigger latch shackle from any  
13 other source other than a marine retailer?  
14 A No.  
15 Q After you bought the two Lewmar trigger latch  
16 shackles from AMSPEC in the summer of '97, you  
17 went out to the marina to do your research, did  
18 you obtain any information from any source that  
19 the Lewmar trigger latch shackles were designed  
20 or manufactured for use in lifting or lowering  
21 humans?  
22 A No.  
23 Q Had you ever seen up to that time a Lewmar  
24 catalog?  
25 A No.

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1 you add a lanyard and pull on the lanyard to  
2 release the latch?  
3 A Yes. So you are saying -- I am watching him do  
4 that box and it distracted me. Are you saying  
5 that did I know that you had to use an external  
6 piece to make it release? Yes. Or anything  
7 attached to it? Yes.  
8 Q I guess I am asking you, up until the time you  
9 bought the two from AMSPEC --  
10 A Right.  
11 Q -- in the summer of '97, had you seen any  
12 literature, catalog, written information which  
13 told you in order to release the latch on a  
14 Lewmar trigger latch shackle you add a line and  
15 pull on it?  
16 A No.  
17 Q Where did you first come up with the idea of  
18 adding a line to the ring on the Lewmar trigger  
19 latch shackle to pull in order to release the  
20 latch?  
21 A We used them on Bay Watch Nights.  
22 Q And what led you to that type of use; that is,  
23 adding a line?  
24 A Because they all had these little rings. There  
25 is no way you can pull it. Unless you can get

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1 Q Had you ever seen any Lewmar literature at all  
2 describing the use of its Lewmar trigger latch  
3 shackle?  
4 A A rate chart.  
5 Q And was that actually a chart by Lewmar?  
6 A Uh-huh.  
7 Q Is that a yes?  
8 A Yes, yes.  
9 Q And what information was on that chart?  
10 A It just tells you the amount of strength of  
11 load it can handle and its breaking capacity.  
12 Q Where was that chart located? Where did you  
13 see it?  
14 A Behind the desk of the marina at the cash  
15 register. They have to have it for everything  
16 they sell in there.  
17 Q Did you obtain any information from any source  
18 that the original design or manufactured use in  
19 terms of opening up a Lewmar trigger latch  
20 shackle was supposed to be by adding a line or  
21 lanyard and pulling on it?  
22 A Reiterate that.  
23 Q Yeah. Had you ever seen any written  
24 information which told you that in order to  
25 properly utilize a Lewmar trigger latch shackle

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1 it, it is never going to release. You have to  
2 pull something on make it -- or stick something  
3 in there. You can stick your finger in there,  
4 but if someone was pulling up, remember, this  
5 stays over here and you go over there. You  
6 don't want to get stuck and break a finger.  
7 So you just want to grab something and  
8 have it, you know -- it's however you rigged  
9 it. You could have it attached to you, but I  
10 wouldn't want all that stuff bouncing on me.  
11 For wrestling I didn't want all this stuff on  
12 his head.  
13 You gotta remember he is getting slammed  
14 on his mat. If it gets behind his neck, it  
15 could hurt him. We had it so once it is  
16 released, it is just setting up there floating  
17 in the air.  
18 Q When you first saw a quick release device on  
19 the Bay Watch Nights program, did it already  
20 have a line on the ring on it?  
21 A Yes.  
22 Q That wasn't something that you came up with on  
23 your own?  
24 A Oh, no.  
25 Q And up to that point had anybody ever told you



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1 Q Then would it have been the point where you  
2 were working with the descender or the point  
3 where you are working with the belay system on  
4 the drop down stunt that Bobby Talbert came on  
5 board?  
6 A The belay.  
7 Q Was there any other prior assistants before  
8 Bobby Talbert?  
9 A With Bobby?  
10 Q You worked on the belay system with Barry  
11 Brazel. Correct?  
12 A Right.  
13 Q Barry brought in Bobby Talbert to assist him.  
14 Correct?  
15 A No, just to help him with the -- in other words  
16 when we are doing one stunt that morning  
17 rigging it and Barry and I are doing that, I  
18 got somebody -- there's gotta be shivs all the  
19 way through the ceiling out the door, 300-plus  
20 foot of rigging and shiving everything.  
21 Q For the Sting belay stunt?  
22 A No, to pull him out.  
23 Q Right.  
24 A When I pull him out, I gotta have a lot of  
25 people. I have to have four people on the

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1 A Through Barry Brazel.  
2 Q And Barry Brazel recommended Mr. Talbert?  
3 A Yeah. He said he was a good stuntman down  
4 there and he knew how to rig.  
5 Q Did you then meet Mr. Talbert before you hired  
6 him?  
7 A No, just brought him up there. I mean, I don't  
8 question what you do as long as I can sit there  
9 and look at everything you have done. If you  
10 didn't do it right I know you don't know how to  
11 do it and we are not going to practice it, and  
12 I will fire you and send you home on a plane.  
13 Q So the first work that Bobby Talbert would be  
14 doing with you with the WCW was the pull-out  
15 work?  
16 A Correct.  
17 Q Was he actually one of the four that helped  
18 pull the performer out?  
19 A No. He only takes one to do it. You do it  
20 with a forklift.  
21 Q What was Bobby Talbert's first job then for  
22 you?  
23 A Ribbing the shivs up in the ceiling.  
24 Q And did you --  
25 A To my knowledge that's the first. It had to

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1 clock.  
2 Q That's the point when Bobby Talbert arrived?  
3 A He was up there setting spansets and hooking  
4 the shackles to the pullies, and then you run  
5 them through and he slides over to another beam  
6 and someone -- you pull everything up with you.  
7 Q Now, you had a verbal agreement with WCW to do  
8 your work there. Correct?  
9 A Yeah.  
10 Q You then hired Barry Brazel to help you.  
11 Correct?  
12 A Correct.  
13 Q Did you hire Bobby Talbert to help you?  
14 A Yes. At that time yeah. I eventually fixed it  
15 where everybody was incorporated and they could  
16 get their own checks. The only reason I paid  
17 everybody is because Turner is slow on paying  
18 you.  
19 Q Now, had Bobby Talbert been working there on  
20 the pull-out for a period of time before you  
21 actually met him?  
22 A No. I came up with pulling them out. I  
23 designed it and he just helped me rig it.  
24 Q How did you first become aware of Bobby Talbert  
25 to hire him?

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1 have been then.  
2 Q And that was about 1998?  
3 A Yeah. It had to have been '98.  
4 Q Because you had been doing the Sting stunt for  
5 a while?  
6 A Yeah. We did that before we ever decided to  
7 start pulling him back out.  
8 Q In fact you had been doing the repelling type  
9 stunt and you had been doing the descender ty  
10 stunt?  
11 A Correct.  
12 Q Before Bobby ever came on the scene?  
13 A Ever came on board. When he came on board he  
14 only worked three times but he was excellent.  
15 We just didn't do a lot of pull out. I only  
16 need help when -- those rings are gigantic, you  
17 know.  
18 Q So Bobby Talbert came on board. You had him  
19 doing the spansets and the rigging up on the  
20 ceiling of a venue. Correct?  
21 A Correct.  
22 Q Did you watch him do that work?  
23 A Well, not physically, but I go up there and  
24 check each with before I run a rope through it,  
25 yeah. Before we do it, I mean, we even came to



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1 A If Barry went and did this stunt --  
2 Q With Owen Hart?  
3 A Anybody. He would only use one. Nobody else  
4 would use two.  
5 Q Except for you?  
6 A Yes. I'm just a little nutty.  
7 Q When Barry worked for you with the Sting stunt  
8 and the belay stunt --  
9 A We started off with one. I am the only one  
10 that -- the first vest we used doesn't have any  
11 of this attached to it. As a matter of fact  
12 the first one, the night of the show I went and  
13 used cable and cabled it to this. He is like,  
14 man, what are you doing? I said, I'm paranoid.  
15 But you don't need all that.  
16 Q And you mentioned that when you switched from  
17 the descender to the belay method, you went  
18 from one shackle to two trigger latch shackles  
19 that you had used. Correct?  
20 A Correct, right.  
21 Q Each of the times that you used the belay stunt  
22 with Sting, you used two shackles?  
23 A Started with one. I just decided to put two on  
24 there.  
25 Q So when you would run the belay stunt, that

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1 I am going to spend \$5,000 for a part and it's  
2 going to save your life I will do it. If you  
3 don't want to do it then just call somebody  
4 else to work. I don't care.  
5 Q So when you are rigging safety is paramount?  
6 A That's right. I don't care what it costs.  
7 Q You are going to do it the way you want to do  
8 it?  
9 A I need to have the ability to spend money --  
10 when you come up on something on Friday night  
11 you want it in a pay-per-view in California on  
12 Sunday if it costs \$20,000 it is going to  
13 cost -- I can't stop to go there to accounting  
14 on Saturday and find you. I want to -- I used  
15 to run 100,000 on my credit card like crazy.  
16 Q If you are going to do a belay stunt with a  
17 human person being descended you are going to  
18 use two shackles?  
19 MR. O'DEAR: I object. The  
20 testimony is clear that he has done it both  
21 ways.  
22 Q (By Mr. Harris) You can answer.  
23 JUDGE GUM: The objection is  
24 overruled. You may answer.  
25 A If I am going to do it I am going to use two of

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1 version with Sting, you would utilize two  
2 Lewmar shackles?  
3 A Correct.  
4 Q Even if Barry was working on it you would use  
5 two?  
6 A Uh-huh.  
7 Q Is that a yes?  
8 A Yes. I mean it is my show.  
9 Q So are you saying that if Barry was on his own  
10 doing a similar stunt with somebody else and  
11 you weren't involved he would have just used  
12 one trigger latch shackle?  
13 A Correct. That is all you would need to do it  
14 safe.  
15 Q That is what Mr. Brazel would choose?  
16 A Anybody would. No one would want to have that  
17 many things conflicting with each other.  
18 Q Other than you?  
19 A Yeah. Sometimes too much is too much, but if  
20 it makes me feel good, it make the talent feel  
21 good, I will just run it.  
22 You gotta remember one thing. A lot of  
23 people don't have -- don't go into shows like I  
24 go into them. I go in the show and it's my way  
25 or no way. I will do whatever you want, but if

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1 them but I will say this, too. I will say this  
2 on behalf of anybody. If I was going to do the  
3 stunt and swing to the girl, one, same thing.  
4 She is setting 40 feet above the air. That is  
5 too many things going on for him to grab and  
6 release her. When it is overnight and need it,  
7 I am going to use two.  
8 Q We are focusing on a straight descent belay  
9 stunt?  
10 A Right.  
11 Q You are going to use two shackles?  
12 A I am going to use two if it is a  
13 night-after-night program, yeah, because it  
14 makes me feel good.  
15 Q Did you ever have any suggestions with Bobby  
16 Talbert about how he rigged the Owen Hart stunt  
17 and whether there was any differences between  
18 his rigging and your rigging?  
19 A No, not to my knowledge.  
20 Q Did you ever have any --  
21 A I was not supposed to talk to anybody because I  
22 was a defendant. I have already done one of  
23 these. I never had to show up. Somebody  
24 called me and drilled my brain for five hours  
25 one time and I had already been through this



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1 approximately twenty Lewmar shackles?

2 A Correct.

3 Q Are you talking about the type that are there

4 in front of you, the trigger latch shackles?

5 A Yes.

6 Q You said those are brand new?

7 A Yes, sir.

8 Q Do you remember when you bought them, how long

9 you have had them?

10 A I think most of them I got in Boston at that

11 marina and then the other ones we did a show in

12 Fort Lauderdale and the marina had them, so I

13 bought probably thirty of them at one time.

14 Q Do you remember how long ago?

15 A Way back in the '98, '99, when I was dropping

16 Sting all the time. It is hard to get them,

17 especially when you throw them away like I do.

18 You start going through them.

19 Q You mentioned that you had also bought some

20 kind of shackles in Australia and Canada?

21 A Correct.

22 Q Were these quick release shackles too?

23 A Yes, sir, correct.

24 Q And do you remember from what, who made them?

25 Are they like these same trigger --

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1 shackle, and it was hard to find one that would

2 hold two of them.

3 Q (By Mr. Harris) Okay.

4 A I just felt that the talent I was using and

5 myself would feel better having two of them.

6 As far as safety no. Well, a mountain climber

7 wouldn't put two carabiners on. When I repel I

8 use one of them. You don't need two.

9 Q Early on originally you have said you started

10 out with just using one?

11 A Right. I remember when we first started Barry.

12 We just had one.

13 Q And you didn't have any particular problem in

14 using one that caused you to use two, I take

15 it?

16 A No. It was just Ellis just one day we were up

17 there and I was just like how about if we just

18 have two of them just since, you know, all

19 these riggers are always watching all this.

20 Everybody used to ask me, why do you use just

21 once? I thought, I put two on there and no one

22 ever said anything again. It just stopped

23 anyone asking me, why do you only need one?

24 Q You didn't do it because you thought using one

25 was unsafe?

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1 A They are very similar. I don't know if exactly

2 they were. I know every time I ever saw one of

3 these they were so hard to get. You can sell

4 them to other stuntmen and they are worth a

5 fortune because they are just so hard to find.

6 Q Shackle of the type you see there, the Lewmar

7 trigger latch shackle, are they still in use in

8 the stunt business today?

9 A Yes.

10 Q You see them often?

11 A No, because I am not in Hollywood anymore but

12 I'm sure if I was there I would see them.

13 Q You testified that in your view you only need

14 one trigger latch shackle in a rigging like

15 this to do it safely and that Barry Brazel, if

16 he were in charge he would just use one?

17 A Correct.

18 Q Do you know why he would choose just one?

19 MR. HARRIS: Okay. Calls for

20 speculation and conjecture.

21 JUDGE GUM: Overruled. You may

22 answer.

23 A Sometimes when you have a lot of things

24 touching each other it's not good to have a lot

25 of things near it. So I had to get a real big

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1 A No. I just wanted to go with two and it

2 actually shut up. Everybody what just saying,

3 God, that one little thing holds that man up

4 there? You put two on there and no one even

5 said a word about it. It just quieted it all

6 down.

7 Q Did you ever have any issue once Sting would

8 release the connection where you were using two

9 trigger latch shackles where the rope after

10 being belayed down that far would spin and

11 cause the two trigger latches to kind of

12 helicopter out?

13 A No. We had an apparatus at the top that -- no.

14 That was on -- that was when I repelled him.

15 No.

16 Q I have seen videos. In fact I have got some

17 here I will ask you about.

18 A You know what makes that do that? That is the

19 difference in using the rope the first time and

20 using it over and over.

21 Q Okay.

22 A First of all you want to use a rope, believe it

23 or not -- it sounds stupid -- several times

24 first because believe it or not they do move.

25 In 200 feet it'll go down eight to nine feet so



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1 heads off.  
2 Q All right. You mentioned that after the Owen  
3 Hart accident when you finally got back to  
4 doing the Sting drop in stunt using the Lewmar  
5 trigger latch shackles, the change you made was  
6 that instead of having both release cords tied  
7 to a single loop you had them separated so it  
8 took two separate pulls to pull the releases.  
9 Right?  
10 A Correct.  
11 Q Now, is the reason -- well, let me go back.  
12 Once you heard about the Owen Hart accident,  
13 you at least had knowledge of at least one  
14 advertent release of a trigger latch shackle.  
15 Correct?  
16 A Correct.  
17 Q So when you go back to doing the stunt, having  
18 knowledge of one inadvertent release, did you  
19 switch to having, requiring, two separate  
20 pulls, simply as adding another layer of safety  
21 to make that a potential inadvertent release  
22 even more unlikely?  
23 A No.  
24 Q In your view did going to separate lanyards  
25 requiring separate pulls in fact make an

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1 A No, only because when you do this -- I mean I  
2 would love to be the person that came up with  
3 all this stuff. I mean, people have been doing  
4 stuff like this in Hollywood forever. I just  
5 came up with headache taking a piece of  
6 Hollywood as me being my own contractor and  
7 taking it to WCW. Anybody else could have done  
8 it and, you know, made a living at it also. I  
9 just happened to think of it.  
10 Q I understand.  
11 A So stunt guys have been using this stuff -- and  
12 we have stunt people that live in Marina Del  
13 Ray that live on sailboats.  
14 Q I understand.  
15 A You talk to somebody that lives on one and  
16 plays with one, of course he feels comfortable.  
17 You gotta remember we are on these things  
18 before the actors ever are, so it is our butt  
19 first. You know you are going to have  
20 something flawless.  
21 Q I want to make sure in all of your discussions  
22 with sailors or marine --  
23 A To my knowledge I never --  
24 JUDGE GUM: Please one at a time.  
25 The court reporter can't take two people

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1 inadvertent release less likely?  
2 A Yes.  
3 Q Okay. But you are just saying that wasn't  
4 necessarily your motivation for doing it?  
5 A Huh-uh.  
6 Q Okay.  
7 A I had already been at a show where OSHA was  
8 there. I knew they were there. I saw them on  
9 the floor. No one ever came upstairs. They  
10 never questioned me. When you see somebody do  
11 two things, they are not going to follow you  
12 around every minute.  
13 Q Understood.  
14 A Be on my nerves when I am trying to work.  
15 Q Understood.  
16 A And it worked.  
17 Q Going back again to the investigation, you  
18 said, and asking around that you did about the  
19 Lewmar trigger latch shackles at various times,  
20 did you ever in any of those inquiries with  
21 marine officers or sailors ever pick up any  
22 information that caused you to believe that it  
23 was improper or unsafe for any reason to  
24 suspend a human being up in the air with a  
25 trigger latch shackle?

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1 talking.  
2 Q (By Mr. O'Dear) I want to know in all your  
3 discussions with sailors, all your discussions  
4 at marine stores, with AMSPEC, with anybody,  
5 whether anybody ever gave you any reason to  
6 believe or suspect there was anything improper  
7 or unsafe about suspending people in the air  
8 with a Lewmar trigger latch shackle.  
9 A No.  
10 Q Okay. In your discussions with sailors, did  
11 anybody ever explain to you that sailors from  
12 time to time will use one of those trigger  
13 latch shackles to attach themselves to a  
14 bosun's seat to run up the mast?  
15 MR. HARRIS: I object to the form.  
16 Leading, suggestive and lacks foundation.  
17 Misrepresents the record.  
18 JUDGE GUM: Overruled.  
19 A No.  
20 Q (By Mr. O'Dear) Do you even know what a bosun's  
21 seat is?  
22 A Yes. They use them on catamarans.  
23 Q Okay. And have you ever seen or heard of  
24 sailors needing to go up to the top of these  
25 100, 120-foot masts to do different things?



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1 A Uh-huh. They run them off of pullies.  
2 Q And do you know how they get up there?  
3 A Uh-huh.  
4 Q How?  
5 A There is two ways you can do it. Some are  
6 counter-balanced and they have a piece hooked  
7 on them and it counter-balances off the mast.  
8 I have seen one of those. And then they are  
9 hooked to -- it's called a mechanical  
10 descender. When you pull it down out of the  
11 top of the sail it's free.  
12 As you go up, it retracts on a gear drive.  
13 We use them, too. Then if you fall you can  
14 only fall two feet. It stops you. It retracts  
15 all the way up and you leave one on the top of  
16 the mast. The ones they use are stainless  
17 steel. The ones we use are aluminums. I got  
18 two of them, 200 footer. That is how we rig  
19 all our trusses.  
20 By OSHA law now you have to be hooked to  
21 one. Sailors are always hooked to something.  
22 They don't free climb anymore.  
23 Q Did anybody ever explain to you that they  
24 sometimes use quick releases to attach  
25 themselves to those applications so they can

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1 away. They must have hit the rope. They said  
2 he hit the ring rope.  
3 You know, there was never any footage. I  
4 think somebody said they had, but I'm sure CNN  
5 had it because it was a live TV production, but  
6 I've never seen it.  
7 (The reporter marked Deposition  
8 Exhibit No. 2 for identification.)  
9 Q (By Mr. O'Dear) I want to show you a videotape,  
10 Mr. Edwards. It is basically a composite of  
11 various WCW aerials. Again since we can't play  
12 it, I will represent to you what's on here.  
13 A Okay.  
14 Q It's basically a series of Sting descents. I  
15 believe the first one was January of '97. The,  
16 last one on this one being April of '99. And  
17 you might just look at those dates. But my  
18 question to you simply is, and I think it's  
19 clear from your testimony, but to the extent  
20 that videotape shows Sting drop-in stunts  
21 conducted on those dates, you are the guy that  
22 was in charge of rigging every one of them.  
23 Correct?  
24 A Yes, sir, correct.  
25 Q Okay. Now, here is another question I had.

1 get on and off quickly?  
2 MR. HARRIS: Same objections. Go  
3 ahead.  
4 A Just catamaran guys. When they sit out there  
5 and they are hanging way off those things they  
6 are hooked to one of those. That way in case  
7 the boat goes over they can unhook themselves  
8 and swim away from the boat.  
9 Q (By Mr. O'Dear) Okay. The house riggers that  
10 you said you'd talked to after the Owen Hart  
11 accident when you were back in the venue, I  
12 assume you mean you were in Kansas City?  
13 A Yes, sir.  
14 Q Do you remember their names?  
15 A No. They were just up there. It was amazing  
16 that somebody was up there watching it.  
17 Q And both of them have told you they were  
18 actually up there when the thing happened?  
19 A Yeah. They were up there when --  
20 Q Okay.  
21 A Because I asked them where did he land. I  
22 guess he hit a ring rope because generally  
23 surprisingly or not if you had fallen out of  
24 there you would have walked away. You would  
25 have broken your legs but you would have walked

1 How many times after the Owen Hart accident did  
2 you do the Sting drop-in stunt?  
3 A I think we did it three or four times when that  
4 new guy came down, Vince Russo.  
5 Q Okay.  
6 A Brought it back. Him and Eric started back and  
7 then Eric was gonna try to bring the NWO back  
8 and we did it.  
9 Q Eric who?  
10 A Bischoff.  
11 Q And so it just lasted three or four shows?  
12 A Yeah.  
13 Q And then it was dropped?  
14 A Yeah. We were rigging blood drops and weird  
15 stuff like that.  
16 Q Was it dropped because of safety concerns or  
17 just artistic --  
18 A No. I think story line. It got to the point  
19 where -- the fun part about it in the beginning  
20 is Sting never said a word in a year. He just  
21 came down and pointed the damn bat at you.  
22 Then when he started talking and he did  
23 everything, you know, you know he is going to  
24 be there. He walked out every night. So why  
25 just waste money me going and rigging him in



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

MARTHA HART, Individually and on  
Behalf of Minors OJE EDWARD HART  
and ATHENA CHRISTINE HART,

and

STU and HELEN HART,

Plaintiffs,

v.

WORLD WRESTLING FEDERATION  
ENTERTAINMENT, INC., et al.,

Defendants and  
Third-Party Plaintiffs,

v.

AMSPEC, INC., LEWMAR LIMITED, and  
LEWMAR, INC., formerly known as  
LEWMAR MARINE, INC.,

Third-Party Defendants.

Case No. 99CV-210774  
Honorable Douglas E. Long, Jr.



FILED - CIRCUIT COURT  
JACKSON COUNTY, MO  
2003 SEP -2 PM 4:45  
*[Signature]*

**LEWMAR'S COUNTER-DESIGNATIONS TO WWE'S DESIGNATIONS  
FROM THE DEPOSITION OF ELLIS EDWARDS**

COME NOW third party defendants Lewmar, and hereby offers the following counter-  
designations to WWE's designations from the deposition of Ellis Edwards:

p.22, line 25 through p.23, line 17 ending with "...or not."

p.41, lines 12-23

p.42, lines 7-14

p.49, line 21 through p.51, line 8

p.58, lines 17-25

p.61, line 19 through p.63, line 25

p.90, line 25 through p.93, line 24

p.95, lines 7-15

p.102, line 13 through p.104, line 2

p.107, lines 6-11

p.109, lines 1-19

p.114, line 22 through p.116, line 11

p.117, lines 17-25

p.118, lines 11-22

p.126, line 25 through p.127, line 12 ending with "...it is."

p.129, line 3 through p.130, line 6

p.132, line 19 through p.134, line 7

p.137, line 11 through p.139, line 12

p.143, line 9 through p.144, line 16

p.159, lines 1-25

p.161, lines 7-25

p.165, lines 12-16

p.165, lines 19-23

p.166, line 6 through p.167, line 3

p.185, line 7 through p.186, line 14

p.188, lines 13-20

p.189, line 12 through p.190, line 1

p.200, lines 5-6

p.200, lines 16-18

p.200, line 25 through p.201, line 14

p.213, lines 13-21

p.215, line 15 through p.216, line 19

p.217, line 25 beginning with "... You said..." through p.219, line 5

p.230, lines 11-16

p.232, line 24 through p.233, line 2

p.233, lines 5-6

p.234, lines 4-14

p.234, line 20 through p.235, line 19

p.257, lines 3-11

Respectfully submitted,

FOLAND, WICKENS, EISFELDER,  
ROPER & HOER, P.C.



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